STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE PREVENTION & EMERGENCY RESPONSE PROGRAM NORTHERN ALASKA RESPONSE TEAM

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File Number: 100.02.001

October 26, 2010

Mr. Daren Knowles Flint Hills Resources Alaska, LLC. North Pole Refinery 1100 H & H Lane North Pole, AK 99705

RE: Sampling and Analysis Plan for ADEC Spill No 10309912801 "Flint Hills Resource Lab Leak"

Dear Mr. Knowles:

The Department of Environmental Conservation has received a copy of the Sampling and Analysis Plan for the North Pole Refinery Area Screening Groundwater Investigation prepared by Shannon and Wilson, Inc. dated October 2010.

After reviewing the document I do not see any problems with the proposed monitoring wells or the analytical methods described.

This Sampling and Analysis Plan is approved subject to the following inclusion below:

ADEC requests soil sampling beneath the drains that failed the hydrostatic testing in order to directly determine if contamination entered the subsurface from these points and evaluate all potential contaminants of concern. If Flint Hills feels this is technically impossible due to the building layout, rationale should be included in the work plan and a conceptual site model developed per 18 AAC 75.335 that assumes there will be residual soil contamination remaining underneath the building.

Please advise me if there are any questions or concerns regarding the inclusion to the plan. I can be reached at 451-2126.

Sincerely

Brian Jackson

Environmental Program Specialist

cc: Tom DeRuyter, S.O.S.C., ADEC/Fairbanks

Daren Knowles, E-mail Copy